



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, Ca. 94105-3901

CERTIFIED MAIL NO. P 686 926 483
RETURN RECEIPT REQUESTED

MAY 28 1992

Daniel F. Becker, President
Becker Mfg. Co., Inc.
215 N. Mason Way
P. O. Box 2277
City of Industry, CA 91746

Re: Request for Information
Becker Mfg. Co., Inc.
215 N. Mason Way
City of Industry, CA 91746

Dear Mr. Becker:

The United States Environmental Protection Agency (EPA) is conducting an investigation of soil and groundwater contamination or threatened contamination resulting from the release or threatened release of hazardous substances in the San Gabriel Valley. The purpose of this investigation is to determine the nature, cause, and extent of the release or threatened release of hazardous substances in the area, and to determine the source or sources of such releases or threatened releases, to assess the effects of any release or threatened release on the public health, welfare or the environment, to determine the details and evaluate the adequacy of any remedial actions that have been planned or initiated to date, and to determine what future response actions are needed to abate the release or threatened release of such substances to the environment.

As part of this investigation, EPA needs historical and present information from companies currently or previously located near the area of known or suspected contamination. EPA has reason to believe that you may be in possession of such information. Therefore, pursuant to the authority of Section 104 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. § 9604, you are hereby requested to respond to the Information Request set forth herein.

Compliance with the Information Request is mandatory. Failure to respond fully and truthfully within thirty-five (35) calendar days of receipt, or to adequately justify such failure to respond, can result in enforcement action by EPA pursuant to Section 104(e) of CERCLA. This statute permits EPA to seek imposition of penalties of up to twenty-five thousand dollars (\$25,000) for each day of continued non-compliance. Please be further advised that provisions of false, fictitious, or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. § 1001.

This Information Request is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. § 3501 et. sec.

Include in your response to this request a notarized affidavit from a responsible company official stating that a diligent record search was completed and that there was a diligent interview of present and former employees who may have knowledge of operations, chemical use, and business practices. The affidavit should include a statement that all information responsive to this request has been forwarded to EPA. The response itself must be signed by a duly authorized official of your company.

DISCLOSURE OF CONFIDENTIAL INFORMATION
TO AUTHORIZED REPRESENTATIVES OF EPA

Pursuant to 40 CFR § 2.310(h), Disclosure to authorized representatives, you are hereby furnished with notice of the contemplated disclosure by EPA of the information provided in response to this Information Request to EPA's contractors and state or local government agencies which have duties or responsibilities under CERCLA. Any comments on this contemplated action must be submitted to EPA within thirty (30) days of receipt of this notice.

Information that may be disclosed includes any response to this Information Request. This information may be made available to authorized representatives of EPA for any or all of the following reasons:

- o Document handling, inventory, and indexing;
- o Document review and analysis; and
- o Technical review of the responses.

Authorized representatives of EPA to which EPA may disclose information contained in your response:

1. PRC Environmental Management, Inc.
EPA Contract Number 068-W9-0009

1. PRC Environmental Management, Inc.
EPA Contract Number 068-W9-0009
2. CH2M Hill California, Inc.
EPA Contract Number 068-W9-0031
3. Labatt Anderson, Inc.
EPA Contract Number 068-W9-0052
4. California State Water Resources Control Board and
California Regional Water Quality Control Board -
Los Angeles Region
EPA Cooperative Agreement Number V-009472-01-4

You must respond to this Information Request by letter, signed by you or a duly authorized official, submitted to the following office within thirty-five (35) calendar days of your receipt of this Request:

Phillip Ramsey (H-6-4)
South Coast Groundwater Section
United States Environmental Protection Agency
P. O. Box 193062
San Francisco, CA 94119-3062

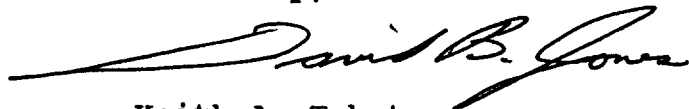
If you will be asserting a confidentiality claim covering all or part of this information request, you should submit your response to:

Phillip Ramsey (H-6-4)
South Coast Groundwater Section
United States Environmental Protection Agency
75 Hawthorne Street
San Francisco, CA 94105

If you need further information concerning technical issues, please contact Phillip Ramsey at (415) 744-2258. If you have any legal questions please contact Mark Klaiman, Assistant Regional Counsel, at (415) 744-1374.

Thank you for your attention to this matter.

Sincerely,



for Keith A. Takata
Deputy Director
Superfund Programs
Hazardous Waste Management
Division

Attachments

ATTACHMENT A

I. Instructions

1. A separate response must be made to each of the Questions set forth in this Information Request.
2. Precede each answer with the number of the question to which it corresponds.
3. If information not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, you must supplement your response to EPA. Moreover, should you find at any time after the submission of this response that any portion of the submitted information is false or misrepresents the truth, you must notify EPA thereof as soon as possible.
4. For each document produced in response to this Information Request indicate on the document, or in some other reasonable manner, the number of the Question to which it responds.
5. For each and every Question contained herein, identify the person(s) answering these Questions on behalf of Respondent.
6. For each and every Question contained herein, identify all persons consulted in the preparation of the answer.
7. For each and every Question contained herein, identify all persons, including Respondent's employees, who have knowledge or information about the subject matter of the Question.
8. For each and every Question contained herein, identify all documents consulted, examined, or referred to in the preparation of the answer and provide true and accurate copies of all such documents.
9. For each and every Question contained herein, if you have reason to believe that there may be persons able to provide a more detailed or complete response to any Questions contained herein or who may be able to provide additional responsive documents, identify such persons and the additional information or documents that they may have.
10. For each and every Question contained herein, if information responsive to this Information Request is not in your possession, custody, or control, then identify the persons from whom such information may be obtained.

11. The information requested herein must be provided notwithstanding its possible characterization as confidential information or trade secrets. You may, if you desire, assert a confidentiality claim covering part or all of the information requested, pursuant to Sections 104(e)(7)(E) and (F) of CERCLA, as amended by SARA, 42 U.S.C. Sections 9604(e)(7)(E) and (F), and 40 C.F.R. 2.203(b), by attaching to such information at the time it is submitted a cover sheet, stamped or typed legend or other suitable form of notice employing language such as "trade secret" or "proprietary" or "company confidential". Information covered by such a claim will be disclosed by EPA only to the extent, and only by means of the procedures set forth in the statutes and regulations identified above. If no such claim accompanies the information when it is received by EPA, it may be made available to the public by EPA without further notice to you. You should read the above cited regulations carefully before asserting a business confidentiality claim, since certain categories of information are not properly the subject of such a claim.
12. Where specific information has not been memorialized in any document, but is nonetheless responsive to a Question, you must respond to the Question with a written response.

II. Definitions

The following definitions shall apply to the following words as they appear in this Information Request.

1. The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, partners, subsidiaries, successors, assigns and agents.
2. The term "person" shall have the same definition as in § 101(21) of CERCLA: an individual, firm, corporation, association, partnership, consortium, joint venture, commercial entity, United States Government, State, municipality, commission, political subdivision of a State or any interstate body.
3. The term the "Site" or the "Facility" shall mean and include the property on or about the Becker Mfg. Co., Inc. site in 215 N. Mason Way, City of Industry, CA 91746.
4. The term "hazardous substance" shall have the same definition as that contained in §101(14) of CERCLA and includes any mixtures of such hazardous substances with any non-hazardous substances, including petroleum products.

5. The term "hazardous waste" shall have the same definition as that contained in § 1004(5) of RCRA.
6. The term "pollutant" or "contaminant" shall have the same definition as that contained in § 101(33) of CERCLA and include any mixtures of such pollutants and contaminants with any other substance including petroleum products.
7. The term "solid waste" shall have the same definition as that contained in Section 1004(27) of RCRA.
8. The term "materials" shall mean all substances that have been generated, treated, stored, or disposed of or otherwise handled at or transported to the Site including, but not limited to, all hazardous substances, pollutants or contaminants, hazardous wastes and solid waste, as defined above.
9. The term "hazardous materials" shall mean all hazardous substances, pollutants, contaminants, and hazardous wastes, as defined above.
10. The term "non-hazardous material" shall mean all materials as defined above, excluding hazardous substances, pollutants and contaminants, and hazardous waste.
11. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business address and business phone number, present or last known home address and home telephone number, and present or last known job title, position or business.
12. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including a sole proprietorship) to set forth its full name, address, legal form (e.g. corporation, partnership, etc.), organization, if any, and a brief description of its business.
13. The term "identify" means, with respect to a document, to provide its customary business description, its date, its number if any (invoice or purchase order number), the identity of the author, addressor, addressee and/or recipient, and the substance or subject matter.
14. The term "release" has the same definition as that contained in § 101(22) of CERCLA, 42 U.S.C. § 9601(22), and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping or disposing into the environment, including the abandonment or discharging of barrels, containers and other closed receptacles containing any hazardous substance or pollutant or contaminant.
15. The terms "document" and "documents" shall mean any object that records, stores or presents information and

includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, report, notice, message, analysis, comparison, graph, chart, interoffice or intraoffice communications, photostat or other copy of documents, microfilm or other

film record, any photograph, sound recording on any type of device, any punch card, disc or disc pack, optical disk, any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc or disc pack, optical disk, tape or other type of memory and together with printouts of such punch card, disc or disc pack, optical disk, tape or other type of memory) and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document.

16. The terms "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
17. All terms not defined herein shall have their ordinary meaning unless such terms are defined in CERCLA, in which case the statutory definitions shall apply.

III. Questions

1. Describe the purpose and operations of your facility, including the date you began operations at the Site and the date, if applicable, that any of the operations ended.
2. List the EPA RCRA Identification Number of the Respondent, if any.
3. Describe any acts or omissions of any persons, other than your employees, agents, or those persons with whom you had a contractual relationship, that may have caused the release or threat of release of hazardous substances at the Site and damages relating therefrom and identify such persons. In addition:
 - a. Describe all precautions that you took against foreseeable acts or omissions of any such third

parties, and the consequence that could foreseeably result from such acts or omissions; and

- b. Describe the care you exercised with respect to the hazardous substances found at the Site.
4. Identify the current owner of the facility. State the dates during which the current owner owned, operated, or leased any portion of the Site, and provide copies of all documents evidencing or relating to such ownership, operation, or lease, including, but not limited to, purchase and sale agreements, deeds, and/or leases.
5. Describe and the physical characteristics of the Site, including but not limited to, the following:
 - a. Surface structures (e.g., building, tanks, etc.);
 - b. Subsurface structures (e.g., underground tanks, sumps, industrial waste clarifiers, etc.);
 - c. Groundwater wells and dry wells, include drilling logs;
 - d. Past and present storm water drainage systems, sanitary sewer system, including septic tank(s) and subsurface disposal filed(s); and,
 - e. Any and all additions, demolitions, or changes of any kind to physical structures on, under, or about the Site, or to the property itself (e.g., excavation work) and state the dates on which such changes occurred.

Provide all existing maps (preferably scaled) that correspond to subparts a. through e. of this Question.

6. Identify all prior owners of the Site. For each prior owner further identify:
 - a. The dates of their ownership; and
 - b. All evidence that hazardous materials were released or threatened to be released at the Site during the period that they owned the Site.
7. Identify the prior operators and lessees of the Site. For each such operator or lessee, further identify:
 - a. The dated of their operations at, or lease of, the Site;
 - b. The nature of their operations at the Site; and

- c. All evidence that hazardous materials were released or threatened to be released at the Site during the period in which they were operating at the Site.
- 8. Provide all existing technical or analytical information about the Site, including, but not limited to, data and documents related to soil, water (ground and surface), geology, hydrogeology, or air quality on and about the Site.
- 9. State whether or not you or your consultants are performing or planning to perform any investigation of the soil, water (ground and surface), geology, hydrogeology, or air quality on or about the Site. If such investigations are underway or planned, identify:
 - a. The nature and scope of these investigations;
 - b. The contractors or other persons that will undertake these investigations;
 - c. The purpose of the investigations;
 - d. The dates when such investigations will take place and be completed; and
 - e. Where on the Site such investigations will take place. Provide all existing maps (preferably scaled) that pertain to Site investigations.
- 10. State whether or not you acquired the Site after the disposal or placement of the hazardous substances on, in, or at the Site. Describe all of the facts on which you base the answer to this Question.
- 11. State whether or not you knew or had reason to know, at the time you acquired the Site, that any hazardous substances was disposed of on, in, or at the facility. Describe all investigations of the Site that you took prior to acquiring the Site, and all of the facts on which you base the answer to this Question.
- 12. State whether or not you ever transported to the Site or used, purchased, generated, stored, treated, disposed, or otherwise handled any hazardous materials at the Site. If the answer to this question is anything but an unqualified "no", identify:
 - a. In general terms, the nature and quantity of the hazardous materials so transported, used, purchased, generated, stored, treated, disposed, or otherwise handled;
 - b. The chemical composition, characteristics, physical state (e.g., solid, liquid, gas) of each hazardous material so transported, used, purchased, generated, stored, treated, disposed, or otherwise handled;

- c. The persons who supplied you with each such hazardous material;
 - d. How each such hazardous material was transported, used, purchased, generated, stored, treated, disposed, or otherwise handled by you;
 - e. When each such hazardous material was transported, used, purchased, generated, stored, treated, disposed, or otherwise handled by you;
 - f. Where each such hazardous material was used, purchased, generated, stored, treated, disposed, or otherwise handled by you, describe the location(s) and provide a map or diagram of such location(s); and
 - g. The quantity of each such hazardous material used, purchased, generated, stored, treated, transported, disposed, or otherwise handled by you.
13. Identify all leaks, spills, or releases or threats of releases of any kind into the environment of any hazardous materials that have occurred or may occur at or from the Site. In addition, identify:
- a. When such releases occurred or may occur;
 - b. How the releases occurred or may occur;
 - c. What hazardous materials were released or may be released;
 - d. What amount of each such hazardous material was so released;
 - e. Where such releases occurred or may occur, describe the location(s) and provide a map or diagram of such locations;
 - f. Any and all activities undertaken in response to each such release or threatened release;
 - g. Any and all investigations of the circumstances, nature, extent, or location of each such release or threatened release, including the results of any soil, water (ground and surface), or air testing that was undertaken;
 - h. Whether any report(s) of any such release(s) was (were) made to any public agency, and the content of that (those) report(s); and
 - i. All persons with information relating to subparts a. through h. of this Question.

14. If any release or threatened release identified in response to Question 12, above, occurred into any subsurface disposal system, floor drain, sump, or dry well inside or under any buildings located on the Site, further identify:
- Precisely where the disposal system, floor drain, sump, or dry well is and was located;
 - When the disposal system, floor drain, sump, or dry well was installed;
 - Whether the disposal system, floor drain, sump, or dry well was connected to pipes;
 - Where such pipes are or were located, describe the location(s) and provide a map or diagram of such location(s);
 - When such pipes were installed; and
 - How and when such pipes were replaced, repaired, or otherwise changed.
15. Identify all liability insurance policies held by Respondent from the time Respondent began operations at, or assumed ownership of (whichever occurred earlier), the Site until the present. In identifying such policies, state:
- The name and address of each insurer and of the insured;
 - The amount of coverage under each policy;
 - The commencement and expiration dates for each policy;
 - Whether or not the policy contains (or contained) a "pollution exclusion" clause; and
 - Whether or not the policy covers (or covered) sudden, nonsudden, or both types of accidents.
- In lieu of providing the information requested in subparts a. through e. of this Question, you may submit complete copies of all insurance policies that may cover the release or threatened release of hazardous materials.
16. Complete the enclosed four-page form entitled "Financial Statement for Businesses" or provide an audited financial statement that contains all of the information requested in the form. If you choose to provide an audited financial statement in lieu of the Financial Statement for Businesses you must also provide a signed declaration equivalent to the Certification found at the bottom of page four of the enclosed form.

17. In addition to the information requested in the previous question, provide copies of your company's federal income tax forms (including attachments) as submitted to the Internal Revenue Service for the last three years. The forms must be signed by a duly authorized official of your company.
18. Provide a copy of the most current Articles of Incorporation and By-laws of Respondent.
19. State your Standard Industrial Classification ("SIC") code, if any, including the date the code was determined or last updated.

1851-03911

<p>SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.</p> <p>Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.</p> <p>1. <input type="checkbox"/> Show to whom delivered, date, and addressee's address. (Extra charge) 2. <input type="checkbox"/> Restricted Delivery (Extra charge)</p>	
<p>3. Article Addressed to:</p> <p>Daniel F. Becker, Pres. Becker Mfg. Co., Inc. 215 N. Mason Way P.O. Box 2277 City of Industry, CA 91746</p>	<p>4. Article Number</p> <p>P 686 926 483</p> <p>Type of Service:</p> <p><input type="checkbox"/> Registered <input type="checkbox"/> Insured <input type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise</p> <p>Always obtain signature of addressee or agent and DATE RECEIVED</p>
<p>5. Signature — Addressee</p> <p>X</p>	<p>8. Addressee's Address (ONLY if requested and fee paid)</p> <p>RECEIVED JUN 8 1992 USPO</p>
<p>6. Signature — Agent</p> <p>X <i>[Signature]</i></p>	
<p>7. Date of Delivery</p> <p>JUN - 8 1992</p>	

PS Form 3811, Apr. 1989

*U.S.G.P.O. 1989-238-815

DOMESTIC RETURN RECEIPT

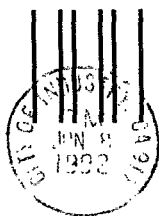
UNITED STATES POSTAL SERVICE

OFFICIAL BUSINESS

SENDER INSTRUCTIONS

Print your name, address and ZIP Code in the space below.

- Complete Items 1, 2, 3, and 4 on the reverse.
- Attach to front of article if space permits, otherwise affix to back of article.
- Endorse article "Return Receipt Requested" adjacent to number.



PENALTY FOR PRIVATE
USE, \$300

RETURN
TO



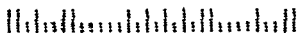
Print Sender's name, address, and ZIP Code in the space below.

Phil Ramsey

U.S. EPA (H-6-4)

75 Hawthorne St.

San Francisco, CA 94105



P 686 926 483



Certified Mail Receipt

No Insurance Coverage Provided

Do not use for International Mail

(See Reverse)

Sent to Daniel F. Becker, Pres. Becker Mfg. Co., Inc.	
Street & No. P.O. Box 2277 215 N. Mason Way	
P.O., State & ZIP Code City of Industry, CA 91746	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Address of Delivery	
TOTAL Postage & Fees	\$
Postmark or Date	

PS Form 3800, June 1990